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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,	: Case No. 22-10943 (MEW)
	: Jointly Administered
Debtors.	:
	:
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**DECLARATION OF CHRISTOPHER FERRARO IN SUPPORT OF MOTION OF
CELSIUS NETWORK LLC FOR ORDER (I) LIFTING THE AUTOMATIC STAY
PURSUANT TO 11 U.S.C. 362(d)(1) AND BANKRUPTCY RULE 4001 AND (II)
GRANTING LEAVE TO FILE LATE PROOF OF CLAIM PURSUANT TO
BANKRUPTCY RULES 3003(c) AND 9006(b)(1)**

I, Christopher Ferraro, hereby declare as follows under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am the Interim Chief Executive Officer, Chief Restructuring Officer, and Chief Financial Officer of Celsius Network LLC (together with its affiliates, "Celsius"). I am familiar with Celsius' day-to-day operations, businesses and financial affairs, and books and records, including agreements entered into by Celsius.

2. I submit this declaration in support of Celsius Network LLC's Motion for an Order (I) Lifting the Automatic Stay Pursuant to 11 U.S.C. § 362(d)(1) and (II) Granting Leave to File

Late Proof of Claim Pursuant to Bankruptcy Rules 3003(c) and 9006(b)(1) (the “Motion”), filed contemporaneously herewith and am familiar with the information contained therein.

3. Except as otherwise indicated, the statements set forth in this declaration are based upon my personal knowledge, my review of relevant documents and information concerning Celsius’ operations, financial affairs, restructuring initiatives, and information obtained from other members of Celsius’ management team and advisors. I am authorized to submit this declaration on behalf of Celsius. I am over the age of eighteen and, if called upon to testify, I could and would testify competently to the facts and opinions set forth in this declaration.

4. On or around June 12, 2020, Voyager Digital LLC (“Voyager”) entered into an Omnibus Wallet Service Agreement (the “Agreement”) with Celsius Network Limited (“Celsius UK”) to provide Voyager users the ability to gain rewards on the cryptocurrencies in their wallets.

5. On or around August 19, 2021 that Agreement was amended and Celsius UK assigned to Celsius Network LLC (“Celsius US”) and Celsius EU UAB (“Celsius EU”) all of its rights, title and interest under the Agreement. Thereafter, Celsius US and Celsius EU assumed all of Celsius UK’s duties and obligations under the Agreement.

6. I understand that on September 23, 2022, Voyager attempted to provide notice of the bar date in its chapter 11 case to Celsius UK (hereinafter, the “Notice”). *Affidavit of Service, Ex. A* [Case No. 22-10943, Docket No. 459].

7. But the address where the Notice was sent to Celsius UK—35 Great St. Helen’s, London, United Kingdom—is an out of date address for a space that Celsius UK no longer occupies. *Id.*

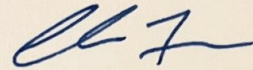
8. Furthermore, the Notice should have been provided to Celsius US and Celsius EU, not Celsius UK.

9. To the best of my knowledge, no Celsius agent or employee ever received the Notice of the bar date in Voyager's bankruptcy.

10. I understand that Holden Bixler of Alvarez and Marsal ("A&M"), has submitted a supporting declaration describing the substantial time and energy that went into preparing Celsius' schedules of assets and liabilities, schedules of current income and expenditures, schedules of executory contracts and unexpired leases and statements of financial affairs. The Court should be aware that Celsius personnel devoted considerable time to assisting A&M in its efforts despite the substantial burden imposed by the commencement of the chapter 11 cases, the limited number of employees available to collect the necessary information, the competing demands upon such employees, and the time and attention that Celsius had to devote to the restructuring process.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
and correct.

Dated: December 13, 2022

A handwritten signature in blue ink, appearing to read 'CF', is written above a horizontal line.

Christopher Ferraro